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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**MEGHAN OPBROEK**, an individual,

**Case No.: 3:22-cv-00610-JR**

**PLAINTIFF,**

**DECLARATION OF WILLIAM W.  
MANLOVE**

v.

**CITY OF PORTLAND**, a municipal corporation,  
**ZACHARY DOMKA** in his individual capacity,  
**BRENT TAYLOR**, in his individual capacity,  
**MARK DUARTE**, in his individual capacity, and  
**ERIK KAMMERER** in his individual capacity,

**(In Support of Defendant City of Portland's  
Unopposed Motion for Extension of Time  
for Reply)**

**DEFENDANTS.**

I, William W. Manlove, Senior Deputy City Attorney representing Defendant City of Portland in the above-entitled matter, declare as follows:

1. Defendant City of Portland filed its Partial Motion to Dismiss on June 22, 2022.
2. Plaintiff filed her Response to Defendant City of Portland's Partial Motion to Dismiss on December 2, 2022.

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3. The parties have and continue to engage in meaningful and substantive discussions in an effort for early resolution of Plaintiff's case in its entirety. Plaintiff and the City have agreed to a Stipulated Protective Order, which the Court entered on October 20, 2022. Plaintiff has already provided some damages information related to her claims. The City and Plaintiff are planning to exchange more information next week.

4. As part of these substantive discussions in their efforts at early resolution, counsel for Plaintiff and City have agreed that a judicial settlement conference would be a beneficial endeavor. Counsel for Plaintiff, Ms. Maya Rinta, and Defendant City have discussed potential mediators for such a judicial settlement conference. I am optimistic that Ms. Rinta and I will reach agreement on a mediator within the next week, and I am optimistic Ms. Rinta and I will be able to have a mediation scheduled to be held in February or early March of 2023. The purpose of any mediation will be to resolve Plaintiff's case in its entirety.

5. I have conferred with Ms. Rinta, via telephone call on Tuesday, December 13, 2022. In order to allow the parties a continuing opportunity to resolve this case, Plaintiff's counsel does not oppose an indeterminate extension for Defendant City to file its Reply to Plaintiff's Response to Defendant City of Portland's Motion to Dismiss.

6. The parties can update the Court by January 6, 2023 on their efforts to schedule a mediation, if the Court so orders or desires.

7. This motion is presented in good faith and not for reasons of delay.

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8. I make this declaration in support of Defendant City of Portland's Motion for Extension of Time to File Reply.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: December 14, 2022

/s/ William W. Manlove  
William W. Manlove